

**From:** Kevin A. Fritz  
**To:** Nicholas Inns; Bender, Kristin; Theresa Troupson; Ellyn Garofalo  
**Cc:** Christina Puello; Stephanie Roeser; Chip Babcock; Joel Glover; Bryan Freedman; Miles Cooley; Jason Sunshine; Mitch Schuster; Stacey Ashby; Amit Shertzer; mitra@ahouraianlaw.com; Cortni Davis; Vaneta Birtha; Jose Perez; Summer Benson; Gottlieb, Michael; Governski, Meryl Conant; Nathan, Aaron E.; Matthew Bruno; Connolly, Michaela; Esra Hudson; Katelyn Climaco; Taustine, Melissa; Kristin Tahler  
**Bcc:** 13133\_1 Wayfarer Studios LLC et al.  
**Subject:** RE: Lively v. Wayfarer  
**Date:** Wednesday, July 2, 2025 12:49:47 PM  
**Attachments:** image001.png

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Nick:

If you are not available on July 22 for Ms. Jones' deposition, please let us know when you are available for her deposition. Thank you.



Meister Seelig & Fein PLLC

Kevin A. Fritz

Partner

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**From:** Nicholas Inns <nicholasinns@quinnemanuel.com>  
**Sent:** Tuesday, July 1, 2025 11:26 PM  
**To:** Bender, Kristin <KBender@willkie.com>; Theresa Troupson <ttroupson@lftcllp.com>; Kevin A. Fritz <kaf@msf-law.com>; Ellyn Garofalo <egarofalo@lftcllp.com>  
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**Subject:** RE: Lively v. Wayfarer

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Dear counsel,

We write in response to the below and the Wayfarer Parties' recent request regarding Ms. Jones deposition.

We are not available to conduct Ms. Jones' deposition on July 22.

We understand from the below that there has been a broader discussion regarding deposition scheduling that counsel for Jonesworks has not been privy to or involved in. Without clear information on what other dates have been discussed, we cannot determine when both Ms. Jones and counsel will be available to hold her deposition. We also understand that there may have been a conversation regarding the number of depositions and the allotment of time at those depositions. We believe all parties would benefit from reaching an understanding as to how depositions of individuals relevant to both related cases will be handled, including extended deposition times and the potential use of deposition testimony in both related cases.

We also understand that the Wayfarer Parties have produced documents to the Lively parties, but Jonesworks has not received multiple of those productions. Please provide those productions as soon as possible and include us on all production and scheduling correspondence moving forward.

Given the upcoming deadline for the completion of fact discovery, our exclusion from scheduling discussions, and the need to resolve how depositions of individuals who are witnesses in both related cases will be handled, we join the Lively Parties' request that the Wayfarer Parties agree to extend the fact discovery deadline so that these issues can be resolved and depositions can proceed in an orderly fashion.

Regards,

Nick

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Tuesday, July 1, 2025 10:20 PM  
**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>  
**Cc:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** RE: Lively v. Wayfarer

[EXTERNAL EMAIL from [kbender@willkie.com](mailto:kbender@willkie.com)]

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Counsel,

We understand that you are eager to select dates for your clients' depositions, as are we, but the minimal availability that you have provided is making it extremely difficult to do so. We do not understand how the vast amount of your clients are available only for 1 or 2 days over the course of the next 6 weeks. We are entitled to take depositions in the order of our preference subject to actual witness availability, and we have taken great pains to afford you the same—most notably by accommodating your express preference to depose Ms. Lively as one of the first deponents. These scheduling challenges are further exacerbated by the fact that we are in the middle of noticing and scheduling additional third parties, which now need to be layered on top of the current schedule, and whose availability must be accounted for.

Please provide additional dates of availability for the below witnesses and explain why Ms. Nathan, Ms. Abel, Mr. Baldoni, Mr. Heath, and Mr. Sarowitz are unavailable except for limited specific dates in an apparent triaged order selected for them. We recall, for example, that you previously indicated Ms. Nathan was only available on August 14 and Ms. Abel was only available on August 15 (outside the discovery period). We will be able to provide Wayfarer 30(b)(6) topics this week.

Best,  
Kristin

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**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
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**From:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Sent:** Tuesday, July 1, 2025 12:17 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>  
**Cc:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** Re: Lively v. Wayfarer

\*\*\* EXTERNAL EMAIL \*\*\*

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Counsel:

Please advise as soon as possible which of the below dates you would like to confirm.

Regards,  
Theresa Troupson

On Jun 30, 2025, at 11:17 AM, Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)> wrote:

Counsel:

Further to our call last week, we can offer the following deposition dates for our clients:

Jamey Heath: July 28 or 29  
Justin Baldoni: July 30 or 31  
Melissa Nathan: August 13  
Jennifer Abel: August 14  
Steve Sarowitz: August 5 or 7

As discussed on our call, we can provide more information about availability for Rule 30(b)(6) deponents when we have greater clarity on the topics on which the entities will be preparing a witness to testify. Please let us know when we can expect that information so that we can confirm availability as soon as possible.

Regards,

Theresa M Troupson  
Partner  
LINER FREEDMAN TATELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
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**From:** Theresa Troupson  
**Sent:** Tuesday, June 24, 2025 6:02 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>  
**Cc:** Christina Puello <[cspuello@lftcllp.com](mailto:cspuello@lftcllp.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

Counsel, in advance of tomorrow's call, we can offer the following deposition dates:

Jamey Heath: July 28 or 29  
Justin Baldoni: July 30 or 31

Please advise which date you prefer for each deponent.

Regards,

Theresa M Troupson  
Partner  
LINER FREEDMAN TATELMAN + COOLEY LLP  
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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Tuesday, June 24, 2025 4:28 PM  
**To:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>  
**Cc:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Stephanie Roeser <[S.Roeser@manatt.com](mailto:S.Roeser@manatt.com)>;  
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<[K.Climaco@manatt.com](mailto:K.Climaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>

**Subject:** Re: Lively v. Wayfarer

That still works for me. Thank you.

---

On June 24, 2025 at 6:52:57 PM EDT, Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)> wrote:

\*\*\* EXTERNAL EMAIL \*\*\*

Me too

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On Jun 24, 2025, at 6:50 PM, Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)> wrote:

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Works for me

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On Jun 24, 2025, at 3:42 PM, Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)> wrote:

All,

Following up on this call. Please let me know if this works for all and I will circulate the invite.

Thank you,  
Christina

Christina Puello  
Executive Assistant to Bryan Freedman  
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1801 Century Park West, 5th Floor  
Los Angeles, California 90067  
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**From:** Christina Puello  
**Sent:** Friday, June 20, 2025 4:34 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jl Glover@jw.com](mailto:jl Glover@jw.com)>; Bryan Freedman <[b freedman@lftcllp.com](mailto:b freedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[j sunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vb birtha@lftcllp.com](mailto:vb birtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[E Hudson@manatt.com](mailto:E Hudson@manatt.com)>; Katelyn Climaco <[K Climaco@manatt.com](mailto:K Climaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

All,

Bringing this to the top. Kindly confirm if 5:00 EST/2:00 PST works next Wednesday 6/25.

Thank you,  
Christina

Christina Puello  
Executive Assistant to Bryan Freedman  
LINER FREEDMAN TAIELMAN + COOLEY, LLP  
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**From:** Christina Puello  
**Sent:** Friday, June 20, 2025 9:19 AM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
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**Subject:** RE: Lively v. Wayfarer

Happy to circulate an invite if this is confirmed for all.

Christina

Christina Puello  
Executive Assistant to Bryan Freedman  
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**Sent:** Thursday, June 19, 2025 1:28 PM  
**To:** Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
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**Subject:** Re: Lively v. Wayfarer

Willkie/Manatt can do 5 pm est.

Thanks,  
Kristin

On June 19, 2025 at 2:55:04 PM EDT, Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)> wrote:

\*\*\* EXTERNAL EMAIL \*\*\*

Yes, but I only have an hour.

Ellyn S. Garofalo  
Liner Freedman Taitelman + Cooley, LLP

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**From:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>  
**Sent:** Thursday, June 19, 2025 11:54 AM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jerez@lftcllp.com](mailto:jerez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

There is a now a conflict at that time. Can we do 5:00 EST/2:00 PST on Wednesday?

Thank you,  
Christina

Christina Puello  
Executive Assistant to Bryan Freedman  
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**Sent:** Thursday, June 19, 2025 7:41 AM  
**To:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[Sroeser@manatt.com](mailto:Sroeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[iglover@jw.com](mailto:iglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

Apologies for the holiday interruption.

Thanks, Christina. We can do 3-4 est on Wednesday. Please send a calendar or let us know if we should.

Best,  
KB

**Kristin Bender**  
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**From:** Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>  
**Sent:** Wednesday, June 18, 2025 3:27 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[Sroeser@manatt.com](mailto:Sroeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[iglover@jw.com](mailto:iglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

\*\*\* EXTERNAL EMAIL \*\*\*

Happy to set for next Wednesday, June 25. Is there a time between 12:30 – 4:00 EST/9:30 – 1:00 PST that would work?

Thank you,  
Christina

Christina Puello  
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**Sent:** Wednesday, June 18, 2025 10:33 AM  
**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jl Glover@jw.com](mailto:jl Glover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHUDSON@manatt.com](mailto:EHUDSON@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

Thanks, Theresa.

We have not received a meeting link and believe that, at this point, it makes sense to have this conversation next week. Please provide availability for next Wednesday.

Additionally, the TAG 30(b)(6) noticed deposition date will need to be moved. Please provide all dates of availability for the TAG 30(b)(6) deposition during the first two weeks of July.

Many thanks,  
KB

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**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
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**From:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Sent:** Tuesday, June 17, 2025 8:54 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[SROeser@manatt.com](mailto:SROeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jl Glover@jw.com](mailto:jl Glover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHUDSON@manatt.com](mailto:EHUDSON@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

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Counsel:

Thank you for your email. We are diligently working to produce the categories of

documents identified in your email. The data volume for those categories is currently estimated to exceed 100 TB, which requires significant processing time. We will produce the documents as soon as they are ready, but certainly by the July 1 substantial completion deadline.

We will circulate a meeting link for 5 p.m. EST on Wednesday.

Regards,

Theresa M Troupson  
Partner  
LINER FREEDMAN TATELMAN + COOLEY LLP  
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Los Angeles, California 90067  
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**Sent:** Tuesday, June 17, 2025 12:45 PM  
**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[Roeser@manatt.com](mailto:Roeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jllover@jw.com](mailto:jllover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraijanlaw.com](mailto:mitra@ahouraijanlaw.com); Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cddavis@lftcllp.com](mailto:cddavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Gubernski, Meryl Conant <[MGubernski@willkie.com](mailto:MGubernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Esra Hudson <[EHUDSON@manatt.com](mailto:EHUDSON@manatt.com)>; Katelyn Climaco <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

Thanks, Theresa.

On the understanding that all footage to be produced in this case, including the footage that may be used or relied on in Ms. Lively's deposition, will be produced by July 1, we agree that the July 17 deposition date resolves the issues raised last week.

Additionally, given the Wayfarer Parties' recent filing with the Court seeking to compel Ms. Lively to produce various categories of information *before* substantial completion (which you filed with the Court even though we made another production on Friday and advised you on Friday's meet and confer that Ms. Lively would be making additional rolling productions between now and July 1 for the information she has agreed to produce), we understand it is your position that specific categories of information can and should be produced in advance of others. Please confirm that the Wayfarer Parties will be producing: (1) all footage, and (2) full, unredacted versions of communications excerpted in the Wayfarer Parties' amended complaint and Exhibit A, by the end of this week. If that is not your intention, please indicate by 6 pm EST today when the Wayfarer Parties will produce this information, which we trust will be well in advance of the July 1 substantial completion date. We intend to inform the Court of your answer (or nonanswer, if that is the case), since you've "cross-moved" against Ms. Lively and have taken the position that you are entitled to a production of specific documents that you deem worthy of an early production. If the Court is inclined to grant your request for early production of specific documents notwithstanding the

rolling production agreement of the parties, then certainly Ms. Lively is entitled to the same relief. Alternatively, we can agree to a mutual production by the end of this week on the categories we have respectively identified, and you can withdraw your “cross-motion,” representing such mutual agreement to the Court.

With respect to your question, our proposal as to document production is that the parties agree to full completion of all document productions, not just substantial completion, for all RFPs issued to date by July 14. We continue to regard July 1 as the appropriate deadline for substantial completion of document production pursuant to the Court’s case management plan.

We can make 5 pm est on Wednesday work – please send an invite or let us know if you would like us to do so.

Thanks,  
Kristin

**Kristin Bender**  
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**From:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Sent:** Monday, June 16, 2025 9:10 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Cc:** Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Stephanie Roeser <[S.Roeser@manatt.com](mailto:S.Roeser@manatt.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[iglover@jw.com](mailto:iglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcoley@lftcllp.com](mailto:mcoley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraijanlaw.com](mailto:mitra@ahouraijanlaw.com); Christina Puello <[c.puello@lftcllp.com](mailto:c.puello@lftcllp.com)>; Cortni Davis <[c.davis@lftcllp.com](mailto:c.davis@lftcllp.com)>; Vaneta Birtha <[v.birtha@lftcllp.com](mailto:v.birtha@lftcllp.com)>; Jose Perez <[j.perez@lftcllp.com](mailto:j.perez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[s.benson@lftcllp.com](mailto:s.benson@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Matthew Bruno <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MCconnolly@willkie.com](mailto:MCconnolly@willkie.com)>; Esra Hudson <[E.Hudson@manatt.com](mailto:E.Hudson@manatt.com)>; Katelyn Climaco <[K.Climaco@manatt.com](mailto:K.Climaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** Re: Lively v. Wayfarer

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel:

We agree to continue Ms. Lively’s deposition to July 17, 2025, in New York. We trust this resolves the other issues regarding the deposition raised in the parties’ meet and confer discussion last week.

With respect to your proposal that the parties “agree to make complete document productions by July 14,” are you proposing that the substantial completion deadline be pushed to that date? If so, we can discuss it with our clients. However, whatever the date of completion, we reserve the right to conduct further discovery based on information that may be provided at the depositions.

We propose a further call on deposition scheduling on Wednesday at 2 pm PT.

Regards,  
Theresa Troupson

On Jun 16, 2025, at 2:29 PM, Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)> wrote:

Counsel,

I am writing to follow up on our meet and confer on Friday.

On the call, we discussed that a June 23 date for Ms. Lively's deposition presents substantial problems as Ms. Lively will not have had the opportunity to review the footage on which you may intend to rely, and because Ms. Lively – like the Wayfarer Parties – will not have substantially completed document production until July 1 and also will not be sitting more than once for her deposition. While you offered to modify some of your representations, we don't believe your offer effectively resolves the issues. More importantly, since the call, we have further considered the viability of a June 23 date in light of our understanding — based on recent public comments you have made — that the Wayfarer Parties intend to file a second amended complaint (which happens to be due on June 23), in which we understand you intend to raise new factual allegations and amended claims against Ms. Lively. Given that these new allegations and claims will surely be topics at Ms. Lively's deposition, we do not understand how June 23 could be a workable date in any scenario. We also note that there is another issue that we didn't fully consider on Friday, which is that a key member of Ms. Lively's defense team is moving across the country this week, which makes the June 23 date untenable for both preparation and defense.

As we've made clear, Ms. Lively remains eager to sit for her deposition as soon as is practical. To that end, on our call, you asked for July dates for Ms. Lively's availability. We understand that it is your strong preference to take Ms. Lively's deposition in advance of your taking any other deposition. We will agree that you may take Ms. Lively's deposition first, on a date that works for the parties and their counsel and that is consistent with your prior suggests for deposition timing. Given this, we are able to offer Ms. Lively to sit for her deposition on the first date in the window of availability you originally requested — that is, July 17, which will allow adequate time for the substantial completion of document production, your planned amendment, and avoiding unnecessary disruptions to the personal travel of counsel and clients occasioned by the July 4 holiday. Let us know if this works.

Along similar lines, we also propose that the parties agree to make complete document productions by July 14. This will ensure any depositions taken after July 14 will be conducted with the benefit of full document discovery, and will avoid the necessity of holding open depositions for deponents who have not completed their document productions. Let us know if the Wayfarer Parties agree.

Last, you also asked for our availability to discuss the deposition calendar on Wednesday. We are available from 3-5 pm est on Wednesday.

Regards,  
KB

Kristin Bender

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**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>  
**Sent:** Thursday, June 12, 2025 8:43 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Roeser, Stephanie <[Sroeser@manatt.com](mailto:Sroeser@manatt.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jl Glover@jw.com](mailto:jl Glover@jw.com)>; Bryan Freedman <[b freedman@lftcllp.com](mailto:b freedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>  
**Cc:** Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Bruno, Matthew <[MBruno@manatt.com](mailto:MBruno@manatt.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Hudson, Esra <[EHudson@manatt.com](mailto:EHudson@manatt.com)>; Climaco, Katelyn <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>  
**Subject:** RE: Lively v. Wayfarer

**\*\*\* EXTERNAL EMAIL \*\*\***

Kristin, thank you for your email. Please let me know if all documents responsive to the categories specified below will be in tomorrow's production.

<image001.png>

**Kevin A. Fritz**  
 Partner

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Thursday, June 12, 2025 8:40 PM  
**To:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Roeser, Stephanie <[Sroeser@manatt.com](mailto:Sroeser@manatt.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jl Glover@jw.com](mailto:jl Glover@jw.com)>; Bryan Freedman <[b freedman@lftcllp.com](mailto:b freedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>  
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**Subject:** RE: Lively v. Wayfarer

**CAUTION:** This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Kevin,

We are available at the time you propose. We will send an invite.

As to your position below, the Wayfarer Parties have already received multiple productions from Sony and WME, and the Wayfarer Parties and Ms. Lively mutually are engaged in making rolling productions in advance of the substantial completion deadline. This is the first time that you have raised a concern with the pace of Ms. Lively's productions, and the Wayfarer Parties have only made two voluntarily productions, or three including the compelled production. Ms. Lively has also produced 2,832 documents, and all of the Wayfarer Parties collectively have produced only 754 documents (including those that were compelled). In any event, Ms. Lively intends to make her next production tomorrow (6/13), and to make regular rolling productions thereafter that will satisfy substantial completion obligations by July 1. All this said, we will be ready to discuss the parties' productions, as needed.

All rights reserved, including with respect to the positions stated below. Finally, as an administrative matter, please keep Melissa Taustine copied on counsel correspondence.

Thanks,

Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
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**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>

**Sent:** Thursday, June 12, 2025 4:51 PM

**To:** Roeser, Stephanie <[S.Roeser@manatt.com](mailto:S.Roeser@manatt.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraijanlaw.com](mailto:mitra@ahouraijanlaw.com); Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>

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**Subject:** RE: Lively v. Wayfarer

\*\*\* EXTERNAL EMAIL \*\*\*

Counselors:

We are available to meet/confer at noon PST / 3pm EST on Friday about Michaela Connolly's email concerning our document production and about Esra Hudson's letter concerning Blake Lively's June 23, 2025 deposition. For the sake of expediency, please also be prepared to discuss Lively's woefully deficient document production. Even though we served our First Set of Request for Production months ago, and even though ten weeks ago

Lively assured us via her formal responses and objections thereto that she would conduct a reasonable search for and produce relevant, non-privileged documents, she has produced nothing other than documents she “obtained” from her company Vanzan, Inc. As merely a few examples, Lively has not produced:

Documents and communications relating to her allegations of sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 3);

1. Documents and communications relating to and/or reflecting her communications with Sony relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 48);
2. Documents and communications relating to and/or reflecting her communications with WME relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 51);
3. Documents and communications relating to her claims for damages (such as those supporting her allegation, in paragraph 457 of her Amended Complaint, that she “has suffered and continues to suffer substantial damages, including, but not limited to, past and future losses in earnings, equity, and other employment benefits and has incurred other economic losses...”);
4. Documents and communications with Taylor Swift who, according to Lively’s Amended Initial Disclosures, has knowledge of “The parties’ alleged conduct; complaints or discussions about the work environment or conduct on the set of the Film; the production, editing, cut, and creative process associated with the Film; publicity surrounding the Film; the retaliation campaign alleged by Ms.

Lively and resulting damages suffered.”

Given that such documents and communications are material and relevant to the crux of Lively’s claims, and given that more than two months have passed since Lively assured us that such documents would be produced, we intent to promptly raise this issue with the Court unless a mutually agreeable resolution is reached.

<image001.png>

**Kevin A. Fritz**  
Partner

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---

**From:** Roeser, Stephanie <[S.Roeser@manatt.com](mailto:S.Roeser@manatt.com)>

**Sent:** Wednesday, June 11, 2025 11:59 PM

**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[iglover@jw.com](mailto:iglover@jw.com)>;

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Katelyn <[KClimaco@manatt.com](mailto:KClimaco@manatt.com)>; Bender, Kristin <[kbender@willkie.com](mailto:kbender@willkie.com)>  
**Subject:** Lively v. Wayfarer

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Counsel,

Please see attached correspondence.

Thanks,  
Stephanie

**Stephanie Roeser**

Partner

<image002.png>

**Manatt, Phelps & Phillips, LLP**  
2049 Century Park East  
Suite 1700  
Los Angeles, CA 90067  
**D** (310) 312-4207 **F** (310) 914-5744  
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